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November 25, 2020

Honorable George B. Daniels
U.S. District Court for the S.D.N.Y.
500 Pearl Street
New York, NY 10007

Re: United States v. Zilberberg, 19 Cr. 802 (GBD)

Dear Judge Daniels:

We represent Mendel Zilberberg in the above-referenced case. On October 13, 2020, this Court approved the following motion schedule: December 4, 2020 – Defense Motions Due; December 21, 2020 – Government Opposition Due; January 4, 2021 – Defense Reply Due.

We have been discussing some of the potential motion issues with the Government in the hopes of resolving disagreements without the need for motions. In order to continue these discussions, we respectfully request—without objection from the Government or counsel for co-defendant Aron Fried—that the Court modify the motion schedule as follows:

- January 4, 2021 – Defense Motions Due
- January 22, 2021 – Government Opposition Due
- February 5, 2021 – Defense Reply Due

This is counsel's first extension request. Thank you for your consideration.

Respectfully,



Benjamin Brafman, Esq.

cc: All Counsel (via ECF)